

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	TABC, Inc.
Facility ID:	003968
SIC Code:	3713
Equipment Location:	6375 Paramount Boulevard Long Beach, CA 90805
Application #(s):	503538
Application Submittal Date(s):	11/06/09
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of TABC, Inc. located at 6375 Paramount Boulevard, Long Beach, CA 90805. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is engaged in the manufacturing of motor vehicle bodies and components. The facility operates surface coating lines, ovens, catalytic converter manufacturing systems, a boiler, emergency internal combustion engines, an afterburner, scrubbers, baghouses, and other supporting equipment.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2000. Numerous permits to construct and or permits to operate have been issued to the facility since May 2000. A Title V renewal permit was issued to the facility on May 11, 2005.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS or NESHAP requirements. To ensure that the facility is exempt from the requirements of 40CFR63 Subpart IIII-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, facility wide permit conditions are specified in the Title V permit limiting the quantity of a volatile hazardous air pollutant emissions (VHAP) from the facility to less than 10 tons per year and a combination of VHAPs to less than 25 tons per year.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

Air pollution control equipment afterburner C112 is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria

and other pertinent requirements identified in 40 CFR 64- Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

PM emissions from several systems within the catalytic convertor manufacturing operation are vented to air pollution control equipment baghouses. However, since the uncontrolled PM10 emissions to each air pollution control system is less than 70 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to the baghouses.

The NOx emissions from the catalytic convertor manufacturing operation are vented to a NOx air pollution control equipment consisting of several packed bed scrubbers. However, since NOx is a RECLAIM pollutant and is subject to Regulation XX requirements of the AQMD, the CAM requirements are not applicable to the NOx control system.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2009

Pollutant	Emissions (tons/year)
NOx	3.823
CO	0.458
VOC	3.469
PM	0.647
SOx	0.006

Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2009

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	369
Benzene	0.314
Formaldehyde	2.49
Methylene Chloride	0.002
Naphthalene	0.014
PAH's	0.002

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1999 with the following risk factors.

Cancer Risk	1.35 in one million
Acute Hazard Index	0.05
Chronic Hazard Index	0.22

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2000. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints, or Notices of Violation issued in the last two years. However, the facility was issued two Notices to Comply on 10/15/08 and 11/19/09 respectively requiring the applicant to use correct missing data procedures for reporting their NO_x emissions and demonstrate compliance with the requirements of Rule 2012 for all CEMS operated at the facility. The facility provided the requested information and is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.